

Exhibit LL

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

4 *****
5 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
6 AND IRBESARTAN PRODUCTS

7 LIABILITY LITIGATION Civil No.
8 19-2875

9 ***** (RBK/JS)

10 THIS DOCUMENT APPLIES TO ALL

11 CASES HON ROBERT B.
12 KUGLER

13 *****

14 - CONFIDENTIAL INFORMATION -
15 SUBJECT TO PROTECTIVE ORDER

16

17

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19 Remote Videotaped via Zoom
20 Deposition of MI (KAREN) XU, commencing at
21 7:02 a.m. China Standard Time, on the 21st of
22 May, 2021, before Maureen O'Connor Pollard,
23 Registered Diplomate Reporter, Realtime
24 Systems Administrator, Certified Shorthand
25 Reporter.

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27

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29 - - -
30 GOLKOW LITIGATION SERVICES
31 877.370.3377 ph | 917.591.5672 fax
32 deps@golkow.com

33

34

1 the authorities was necessary.

2 BY MS. HILTON:

3 Q. If we look at number 5, and
4 number 5 appears to discuss potential
5 compensation, or, as you would refer to it,
6 settlement, and it refers to someone named
7 "Discuss with Chen & Chen."

8 To the best of your knowledge,
9 who are Chen & Chen when used as such?

10 A. I'm not sure. That is because
11 I can't even confirm who generated this
12 document.

13 Judging by the choice of words
14 and the format of this document, I can tell
15 that it is a draft, an unofficial document;
16 therefore, I am afraid I cannot respond to
17 your question.

18 Q. So you don't know if "Chen &
19 Chen" refers to Baohua Chen, the president of
20 the company?

21 MS. BONNER: Objection.

22 A. At least judging from the
23 context, I cannot draw such a conclusion.

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